RESPONSE TO COMMENTS

Response to Alabama Department of Environmental Management Comments
Draft Site Investigation Report
Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q
Fort McClellan, Calhoun County, Alabama

Comment from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, dated January 28, 2003.

Comment 1: **The Alabama Department of Environmental Management (ADEM or the Department) and the Environmental Protection Agency (EPA) have reviewed Fort McClellan's *Site Investigation Report for the Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q.* ADEM concurs with EPA's comments attached for your review and response. Please submit responses to the Department within 45 days from receipt of this letter.**

Response 1: Comment noted.

Response to U.S. Environmental Protection Agency Comments
Draft Site Investigation Report
Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q
Dated September 2002
Fort McClellan, Calhoun County, Alabama

Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated September 26, 2002.

General Comment

Comment 1: **The evaluation and selection of COPCs in this document eliminated constituents as COPCs based on comparison to the range of background concentrations of each individual constituent. While this form of comparison is appropriate for consideration in Step 3a of the ERA process, it is not appropriate for inclusion in a Site Investigation Report. Many constituents were eliminated based on this incorrectly applied approach and these constituents should be re-included as COPCs and carried forward for further evaluation.**

Response 1: Site metals data were re-evaluated in accordance with the new background screening protocol agreed to by the BCT in March 2003. The three-tiered process consists of statistical testing and geochemical evaluation to select site-related metals. The background screening methodology is described in the technical memorandum "Selecting Site-Related Chemicals for Human Health and Ecological Risk Assessments for FTMC: Revision 2," (Shaw Environmental, Inc., 2003).

Specific Comments

Comment 1: **<u>Page ES-1, Lines 29 and 30</u>. These lines state that certain metals exceeded their respective SSSLs and upper background ranges in only one or two samples. Be specific. Did the exceedances occur in one sample or in two samples?**

Response 1: Comment noted. The text was revised accordingly based on the results of the new background screening protocol.

Comment 2: **<u>Page ES-2 and Elsewhere.</u> The statement is made that *IT recommends "No Further Action" and unrestricted land reuse with regard to hazardous, toxic, and radioactive waste at Former Rifle/Machine Gun Ranges, Parcels 100Q and 101Q".* This statement needs to be revised to include only those substances covered within the subject document.**

Response 2: Agree. The text was revised to indicate "...with regard to CERCLA-related hazardous substances..."

Comment 3: **Page 3-2, Second Complete Paragraph. This paragraph states that subsurface soil samples were collected at a depth of 3 to 4 feet below ground surface. The third complete paragraph states that subsurface soil samples were collected continuously to 12 feet and that the deepest sample above the saturated zone was submitted for analysis. This inconsistency should be addressed.**

Response 3: Agree. The text was revised to indicate that "...samples were collected continuously to 4 feet below ground surface..."

Comment 4: **Page 5-1, Line 11. This line states that metals concentrations exceeding the SSSLs and ESVs were subsequently compared to metals screening values to determine if the metals concentrations are within natural background concentrations. As written, it is difficult to determine what background screening was utilized (i.e., 2 times the mean background concentration, range of background, or additional statistical comparison). The text should be clarified to state that the only comparison to background that was performed for the elimination of COPCs was the comparison of the maximum concentration of each respective constituent to two times that constituent's mean background concentration.**

Response 4: See response to General Comment No. 1.

Comment 5: **Page 5-1, Line 31. The text states that twenty metals were detected in the surface soil samples. Of these metals, with the exception of lead in one sample, these metals concentrations were within their respective upper background ranges. If the fact that the metals were within their upper background range is being supplied for additional information, then this fact should be stated. Based on this text and its associated tables, the range of metals detected in background is being used as a supplemental method to screen out COPCs. If this fact is true, then the use of background ranges of concentrations is inappropriate for inclusion at this time for elimination of a metal as a COPC. Therefore, any metal eliminated as a COPC, based on its concentration being within the respective metals range of background concentrations, should be re-included as a COPC and carried through to the next step of the risk process.**

Response 5: See response to General Comment No. 1.

Comment 6: **Page 5-1, Line 34. The text states that lead exceeded its SSSL and upper background range. If the fact that lead exceeded its upper background range is being supplied for additional information, then this fact should be stated.**

Response 6: See response to General Comment No. 1.